REMARKS

In the present Office Action, the Examiner rejects claims 19 through 27 under 35 U.S.C. 102(e) as anticipated by U.S. Patent No. 6,606, 748 to Tomioka ("Tomioka"). Applicants respectfully request reconsideration and withdrawal of the rejections in light of the remarks below.

Independent claim 19 is directed towards a method for synchronizing and propagating changes to an event comprising assigning an event an event identifier, registering the event in a first table wherein said first table stores the event identifier and an event trigger, and registering interests of at least one other event in a second table wherein said second table stores a procedure to execute for said event trigger. A change to the event generates an event trigger, which results in inspecting the first table to identify said event trigger for said generated event trigger and inspecting the second table for the procedure to execute upon identifying the event trigger for the event identifier. The procedure is executed to change at least one of said at least one other event in response to identifying said procedure upon inspecting the second table. Independent claims 23 and 27 are substantially similar to independent claim 19, but cast as a system and computer program embodied on a computer readable medium, respectively.

Tomioka discusses systems and methods that enable communication costs to be reduced by transmitting only changes in program schedule information. Abstract; Col. 13, lns. 6-35. Original data is segregated into first data, also referred to as "framework" data, and second data, also referred to as "variation" data. Col. 2, lns. 22-53, col. 9, ln 65 - col. 10, ln. 20. Framework data is data that remains "substantially fixed, i.e., which are know to change only relatively infrequently or which undergo only

relatively small amount of variation which changes occur due to updating." Col. 2, lns.27-31. Variation data consists "of data which are know to change relatively frequently or which undergo relatively large amounts of variation when changes occur due to updating." Col. 2, lns. 31-34.

Tomioka also discusses the use of management data, which a management data conversion section at the client uses to alter the framework data and the variation data. Col. 11, lns 6-15. Management data may be used for "linking together data of the same type (i.e., variation data or framework data) during processing . . . to reconstitute program data by using selected parts of the framework data and variation data." Col. 18, lns. 49-56. The framework data, variation data and management data is used to provide updates to a program schedule without requiring the re-transmission of unchanged framework data. Col. 20, lns. 45-65; Figs. 3 and 4. Correctly updated program information is reconstituted by combining relevant parts of the variation data and the framework data, with priority being given to the framework data. Col. 20, ln. 66 - col. 21, ln. 4.

Applicant has conducted a thorough review of Tomioka and respectfully asserts that Tomioka does not anticipate the independent claims of the present application. First, Tomioka does not discuss assigning an event an event identifier as claimed. Tomioka discusses current program data that consists of a program name and attributes, including start time point and duration. Col. 10, lns 1-7. Current program data is edited to "to separate the current program data into the aforementioned framework data and variation data, and to thereafter update the stored variation data whenever an updated set of current program data are acquired." Col. 10, lns. 14-17. The sections upon which

3

the Examiner is relying, however, are silent with regarding to the assignment of an event identifier to an event and does not teach or suggest assigning an identifier to framework data, variation data or management data.

Tomioka also fails to teach or suggest the claimed element of registering the event in a first table wherein the first table stores the event identifier and an event trigger. The Examiner is correct that Tomioka discusses the storage of framework data and variation data in the form of respective tables. Col. 20, lns. 28-30. Tomioka, however, does not discuss storage of an event identifier and an event trigger. At most, Tomioka discusses that variation data may consist of data for altering the starting time point and/or duration of one or more of the regular programs (specified in the program data). The portions of Tomioka upon which the Examiner relies discuss the storage of variation data as displacement amounts with respect to values specified in the framework data, but is otherwise silent regarding an event trigger and the storage thereof.

Similar to the storage of an event identifier and an event trigger, Tomioka is silent with regard to registering interests of at least one other event in a second table wherein the second table stores a procedure to execute for the event trigger. The Examiner asserts that the management data of Tomioka reads onto the interests of at least one other event. Contrary to the Examiner's position, however, Tomioka discusses that management data links together framework data and variation data to reconstitute program data by using selected parts of the framework data and the variation data. Col. 18, lns. 47-58. Tomioka is silent with regarding to the creation of management data registering an interest of at least one other event. Furthermore, although the Examiner appears to be correct in his characterization of altering other programs on a given channel

in response to a program shift, there is no table for the storage of a procedure to execute for the event trigger, as claimed. Indeed, Tomioka is silent with regard to the storage of a procedure to execute for the event trigger and only discusses the storage and use of variation data to modify framework as to time displacements to programs in the framework data. Col. 20, lns. 11-24 and 45-65, Figs. 2 and 3.

With regard to the inspection of the first table and the second table, the Examiner asserts that Figs. 2 and 3 discuss inspecting the variation data storage section and the management data storage section, which reads onto these claim elements. The recited claim elements, however, describe inspecting the first table to identify the event trigger for the identified event and inspecting the second table for the procedure to execute upon identifying the event trigger for the event identifier for the event that was changed. As discussed above, Tomioka does not teach or suggest the storage of event triggers and procedures to execute upon identifying the event trigger. At most, Tomioka discuss variation data (which are differences between framework data and updated program information) and management data (which is used to link framework data and variation data). Abstract; Col. 9, ln.65 - col. 10, ln. 45; Figs. 3 and 4. Therefore, although Tomioka discusses means for accessing variation data and management data, Tomioka is silent with regard to inspecting as claimed.

Finally, Tomioka does not teach or suggest executing the procedure as claimed. Tomioka discusses the selection of framework data, which is rarely updated, and the propagation of variation data which, when combined with appropriate parts of the stored framework data, can reconstitute desired program data, thereby minimizing the amount of transferred information. The independent claims, by contrast, are directed

towards detecting a change to an event and determining interested events to be modified and the procedures to use in the modification. The invention as presently claimed therefore provides for the selective propagation of information through the registration of event triggers and related procedures to be run on interested events in response to event changes. Accordingly, Applicant respectfully asserts that Tomioka does not anticipate independent claims 19, 23 and 27. Applicant further respectfully requests withdrawal of the rejection and allowance regarding the same.
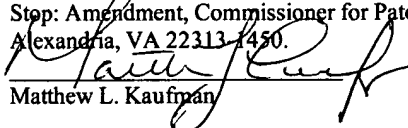
The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the prior art of record. Given the Applicants' position on the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

For at least all of the above reasons, Applicants respectfully request that the Examiner withdraw all rejections, and allowance of all the pending claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the Applicants' undersigned representative to discuss any issues relating to this application.
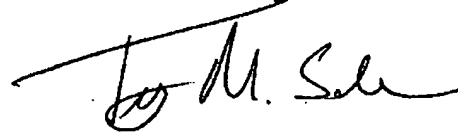
Dated: <u>January 4, 2007</u>

Respectfully submitted,

Customer No. 61834

Timothy M. Salmon
Reg. No. 36,111
DREIER LLP
499 Park Ave.
New York, New York 10022
Tel : (212) 328-6000
Fax: (212) 328-6001

I hereby certify that the correspondence attached herewith is being deposited this date with the U.S. Postal Service as First Class Mail with sufficient postage addressed to Mail Stop: Amendment, Commissioner for Patents, Box 1450, Alexandria, VA 22313-1450.

_____   _____
Matthew L. Kaufman   Date